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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
CAS Communications, LLC for a Certificate of)
Public Convenience and Necessity to Provide) Case No. 14-0239-TP-ACE
Facilities-Based Local Exchange and Interexchange)
Telecommunications Services)

**MOTION AND MEMORANDUM FOR PROTECTIVE ORDER FOR
FINANCIAL STATEMENTS OF CAS COMMUNICATIONS, LLC**

CAS Communications, LLC ("Applicant"), pursuant to Section 4901-1-24 of Public Utility Commission of Ohio's ("Commission") rules respectfully requests that the Commission grant protection from public disclosure and afford confidential treatment to its financial statements and other evidence of financing (collectively, "Financial Statements"), attached as Exhibit D to its Application to Provide Facilities-Based Local Exchange, and Interexchange Service. Applicant requests that the Commission afford the highest level of protective treatment to its Financial Statements and that they be made available only to the Commission.

Exhibit D sets forth the details of its financing and funding in Ohio as well as in its other operating states. The information contained in Exhibit D is competitively sensitive, proprietary, and confidential, constituting a trade secret. The details of the Applicant's financials are not known to Applicant's competitors, and this type of information is not ordinarily disclosed in the industry.

Applicant is a privately held company, and accordingly is not required to make public disclosure of its financial statements.

Disclosure would have adverse competitive consequences for Applicant. Absent protection from disclosure, Applicant's competitors would have access to sensitive financial data and proprietary

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information. Because Applicant is operating in a highly competitive market, public availability of this information will disadvantage Applicant to the benefit of its competitors. Release of this information to the public would cause unfair economic damage and substantially harm Applicant's ability to compete in the marketplace.

Protecting these Financial Statements from disclosure would not affect the public interest. Protecting the Financial Statements from disclosure in no way restricts interested parties from having access to the administrative hearing process. Furthermore, the harm that would result from disclosure of this information far outweighs the public interest in the details of the transaction set forth in the Financial Statements.

Accordingly, and for the foregoing reasons, Applicant respectfully requests that the Commission afford confidential treatment to Exhibit D of its Application to Provide Facilities-Based Local Exchange and Interexchange Service.

Respectfully submitted,

CAS Communications, LLC
By: Community Antenna Service, Inc.,
Its: Member

By: Arthur R. Cooper
Arthur R. Cooper, President
Phone number 304-420-2470

Dated: 2/20/14